# UNITED STATES DISTRICT COURT FOR THE DISTRICT OF RHODE ISLAND

CAROLYN RAFAELIAN, an individual, : ALEX AND ANI PLEDGE CO., a : Rhode Island Corporation and : VENICE BEACH WALK, LLC, : a California Limited Liability Company, : Plaintiffs, :

Vs. : C.A. No. 1:20-cv-00247-MSM-PAS

LC A&A HOLDINGS, INC., a Delaware
Corporation, LC A&A INTERMEDIATE
INVESTORS, LLC, a Delaware limited
liability company,
LYNDON LEA, an individual,
A and A SHAREHOLDING CO., LLC,

a Delaware limited liability company, and : ROBERT TRABUCCO, an individual, : Defendants. :

## **STIPULATION**

In the above-entitled action, it is hereby agreed that the following entry may be made:

- 1. Plaintiffs may have up to and including October 2, 2020 in which to file their Opposition to Defendants' Motion to Dismiss.
- 2. Defendants may have up to and including October 16, 2020 in which to file their Reply Brief in Further Support of Defendants' Motion to Dismiss.

Plaintiffs, Carolyn Rafealian, Alex & Ani Pledge Co. and Venice Beach Walk, LLC, By their Attorney,

#### /s/ Kurt T. Kalberer, II

Kurt T. Kalberer II, Esquire (#8007) KALBERER LLP 7 World Trade Center 250 Greenwich Street, 46<sup>th</sup> Floor New York, NY 10004 (212) 266-0044 kkalberer@kalbererlaw.com Defendants, LC A&A Holdings, Inc., LC A&A Intermediate Investors, LLC and Lyndon Lea, By their Attorneys,

### /s/ Matthew T. Oliverio

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Defendants, A and A Shareholding Co., LLC and Robert Trabucco, By their Attorneys

## /s/ Douglas J. Emanuel

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Dated: September 10, 2020

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Mary S. McElroy, U.S.D.J.